INSTALLATION INTERVALS. CAN AMERITECH ILLINOIS ~~SWBT~~ PROVIDE THE SERVICE IN THE INTERVALS REQUESTED BY THE CLECS?

A. No. Rhythms and Covad argue that Ameritech Illinois should be required to complete the provisioning and installation of the Line Sharing UNE within three business days between June 6 to September 6, two business days from September 7 to December 7, and one day thereafter. Ameritech Illinois objects to these provisioning and installation intervals.

The Rhythms' and Covad's requested intervals are extremely unreasonable and fail to consider the work required, the process involved, and volume of orders expected. These CLECs apparently believe provisioning line sharing is a simple matter of just running a couple of jumpers and therefore should only take one day where line conditioning is not needed. CLECs are requesting DSL capable loops and Ameritech Illinois has a responsibility to provide DSL capable loops. Not all POTS loops are DSL capable loops as CLECs would like to have the Commission believe in support of its requested interval. Many steps are involved in providing DSL service on a DSL capable loop. First, an accurate LSR must be received. When accurate and complete, a service order is distributed to the downstream OSS. The systems then must assign cable pairs, jumpers, and splitter ports (when Ameritech Illinois owned) to complete the work order. If any mismatch or miss-assignment occurs, the order will fall out for manual processing. If the service order is placed at the exact same time the end-user is ordering Ameritech Illinois POTS service, the system will first have to assign and inventory the POTS line before

being able to assign the service order. Next, the service order is queued for dispatch to a central office technician, who must wire the service and conduct basic continuity tests and verification of the frame wiring before completing the order. If the order requires Ameritech Illinois to conduct a line and station transfer to free up a cable pair, a field technician must be dispatched to the appropriate cross connect terminal and a coordinated transfer must be worked.

Obviously, there is a significant amount of work that must be performed in order to complete line conditioning, and it is not reasonable to expect that such work can be performed in all circumstances in the tight intervals proposed by Rhythms and Covad. Under Rhythms' and Covad's proposal, however, failure of an Ameritech Illinois technician to complete the required tasks within the short specified time frames would constitute a breach of contract. Adoption of Rhythms' and Covad's strict one- and three-day intervals, especially as line sharing is first implemented and subject to large-scale testing, would impose impossible contractual obligations on Ameritech Illinois. Consequently, Ameritech Illinois urges the Commission to adopt its 5/10 day schedule or parity with its data affiliate, whichever is less.

Q. RHYTHMS AND COVAD ASSERT THAT REMOVING ONE CROSS-CONNECT AND REPLACING IT WITH TWO NEW CROSS CONNECTS WOULD TAKE LESS THAN 10 MINUTES AND, THEREFORE, THERE IS NO REASON TO REQUIRE MORE THAN 24 HOURS. (Covad Ex. 2.0 at 20 (Zulevic)). HOW DO YOU RESPOND?

A. Again, Rhythms and COVAD expect a DSL capable loop, not just a POTS loop. Also, as

explained above, many steps and many systems are involved in the provisioning of a DSL capable loop. It is important to note that Rhythms, Covad *and* Ameritech Illinois expect Ameritech Illinois to achieve or surpass performance measurements with regard to DSL. In order to do so, Ameritech Illinois must have the opportunity, in terms of time, to ensure that CLECs orders for line sharing can be properly provisioned. As the arbitrator in California ruled in his draft ruling

> : "CLECs fail to convincingly show that the proposals of ILECs are inconsistent with parity, or that less than parity is reasonable. While the work may be done more quickly than allowed by the ILECs' intervals, it would be unreasonable to adopt short intervals here. It would be unreasonable since the expectation is that there will be fast implementation of xDSL service, with large-scale mass marketing. ILECs and CLECs are seeking as many customers as possible and will continue to do so after June 6, 2000. The expected increase in demand will likely challenge any but the most liberal of preset intervals for provisioning and installation of the line sharing UNE. It would be particularly unreasonable to adopt shorter than parity since failure to complete the provisioning and installation would be a breach of contract, and invite unproductive conflict. The ILECs position is adopted."

Q. DOES THE FCC'S *LINE SHARING ORDER* PROVIDE GUIDANCE ON THE ESTABLISHMENT OF INTERVALS?

A. Yes. Paragraph 174 of the *Line Sharing Order* states:

> Because there are currently no standard state-required provisioning intervals for the high frequency portion of the loop network element, we urge states to consider a standard based on the time required to provision xDSL capable loops. We believe that this is the most accurate analogue that exists currently.

Again, Ameritech Illinois is offering five days for loops (up to 20 loops per order) that require no conditioning (two days less then current interval of seven days for xDSL

capable loops) and ten days (up to 20 loops per order) for loops that require conditioning (same as xDSL capable loops). In all cases, Ameritech Illinois agrees to offer parity with the intervals it provides its data affiliate, if less than the five- and ten-day intervals quoted.

ISSUE 7:

Q. DESCRIBE AMERITECH ILLINOIS' POSITION WITH RESPECT TO RHYTHMS' AND COVAD'S ARGUMENT THAT AMERITECH ILLINOIS SHOULD PROVIDE LINE SHARING OVER FIBER-FED DIGITAL LOOP CARRIER SYSTEMS.

A. Rhythms and Covad requests that Ameritech Illinois be required to provide a line sharing arrangement that includes fiber-fed digital loop carrier ("DLC") systems. It is Ameritech Illinois' position that fiber-fed DLC is not considered line sharing.

By definition, line sharing can occur only on copper wires. The FCC required incumbent LECs to unbundle the "high frequency portion of the loop to permit competitive LECs to provide xDSL-based services by sharing lines with the incumbent's voiceband services."[10] The FCC then specifically defined the "high frequency spectrum network element" to be "the frequency range above the voiceband on a copper loop facility used to carry analog circuit-switched voiceband transmissions."[11]

These definitions do not apply to the fiber portions of a DLC system. With a DLC

10/ *Line Sharing Order*, ¶ 13 (emphasis added).
11/ Id. ¶ 26 (emphasis added).

system, analog signals are carried over copper from the customer's premises to a remote terminal (RT) where the copper loop terminates on a splitter that separates the voice and the data. Transport between the RT and the Central Office is then provided over fiber. Thus, copper, with high and low frequency ranges as described in the *Line Sharing Order*, runs only from the RT to the customer's premises in a DLC system. When the FCC required line sharing for loops served by DLC systems, it intended for an ILEC to provide the CLEC with access to the copper portion of the loop at the RT, so that the CLEC could share the copper line between the RT and the customer's location. Ameritech Illinois' proposed interim agreement provides CLECs with that access.

Ameritech Illinois' Project Pronto is a fiber-based system that runs from the remote terminal (RT) to the central office and employs Next Generation Digital Loop Carrier (NGDLC) and associated facilities. Project Pronto is in its initial stages of deployment and will take approximately three years to complete. Like existing DLC systems, the network architecture of Project Pronto does not fit the FCC's definition of line sharing, because it uses fiber facilities and packet switching between the RT and the Central Office.

Ameritech Illinois will provide transport of the CLEC's digital signals from the RT to the central office; it will do so, however, as a separate wholesale service. For example, when the provisions in the FCC's UNE Remand Order relating to "dark fiber" become effective, Ameritech Illinois will provide dark fiber to CLECs under rates, terms and

conditions which are consistent with that Order.

Ameritech Illinois will also offer CLECs access to Project Pronto functionality. However, Ameritech Illinois and CLECs need an adequate opportunity to negotiate, as prescribed by Section 252 of the Telecommunications Act of 1996, regarding this system. The need for negotiation is evident from Rhythms' and Covad's proposed line sharing amendment. That amendment attempts to separate Project Pronto into components that are, in fact inseparable. For example, it is technically infeasible for Ameritech Illinois to provide the following elements proposed by Rhythms and Covad, at least as Ameritech Illinois understands those elements: the LCRT, FPVP, and ATM Ports. Rhythms' and Covad's amendment would also require Ameritech Illinois to combine elements that it is not technically feasible to combine, such as a line card and the high frequency portion of the subloop only.

Negotiation may allow Ameritech Illinois and CLECs to come to a common understanding of what Project Pronto components can be feasibly unbundled. If negotiations fail, parties should pursue arbitration at that time, pursuant to the requirements of Section 252.

Q. RHYTHMS AND COVAD, HOWEVER, ARGUE THAT UNLESS THE COMMISSION MAKES LINE SHARING OVER FIBER-FED LOOPS AVAILABLE, COMPETITORS WILL BE COMPETITIVELY DISADVANTAGED. HOW DO YOU RESPOND? (Rhythms/Covad Ex. 1.0 at 10 (Murray); Rhythms Ex. 1.0 at 6 (Bonney); Covad/Rhythms Ex. 2.0 at 29 (Riolo)).

A.0

ISSUE 9:

Q. DESCRIBE AMERITECH ILLINOIS' CONCERN OVER RHYTHMS' AND COVAD'S PROPOSAL CONCERNING AMERITECH ILLINOIS TESTING AND THE CLEC AFFIRMATIVELY ACCEPTING THE LINE SHARING UNE.

A. Rhythms and Covad argue that Ameritech Illinois should not consider installation of the Line Sharing UNE complete until Ameritech Illinois tests and the CLEC affirmatively accepts the line Sharing UNE.

Ameritech Illinois will perform acceptance testing on loops that require technicians to be dispatched to the field to complete work to allow line sharing. On loops that do not require dispatch, CLECs must notify Ameritech Illinois, and define what testing they request. Moreover, Ameritech Illinois' obligation is to provide the CLECs with a loop that has *continuity, line balance, is DSL capable* and has any ordered conditioning completed. And, Ameritech Illinois will fully test each loop before completing the service order. If the CLEC xDSL services does not work, but Ameritech Illinois has provided continuity and line balancing, and has fully tested the loop, the CLEC must accept the loop. Indeed, whether or not the CLEC service works at the speed and reach desired should not be a factor.

Q. DOES AMERITECH ILLINOIS AGREE WITH THE CLEC AFFIRMATIVELY ACCEPTING THE LINE SHARING UNE?

A. Rhythms' and Covad's language requires Ameritech Illinois to hold open the order until

the CLEC has affirmatively accepted it. CLECs have long requested for a flow through environment that includes automatic notification of completed work as soon as the work has been completed. Ameritech Illinois has all of the processes in place for the flow through process and automatic completion that CLECs have long requested. When Ameritech Illinois closes a service order for the line sharing UNE, several timelines are triggered, such as billing, provisioning interval, performance measures, and other downstream work that Ameritech Illinois will need to initiate. Additionally, leaving orders open requires a service representative to "touch" the order a second time, incurring additional costs for Ameritech Illinois. Consequently, it is important that Ameritech Illinois close the service order as soon as installation of the line sharing UNE is complete. Moreover, if Ameritech Illinois determines that the loop is functioning, there is no reason to keep the service order open pending CLECs' affirmative acceptance of the UNE. This is consistent with the FCC's view on the ILECs' responsibility for completing line sharing service order requests. The *Line Sharing Order* at Paragraph 174, states:

> Provisioning Interval. The application date is the day that the requesting carrier authorizes the incumbent to provision the xDSL capable loop based on the loop qualification. The completion date is the day that incumbent completes the service order activity.

ISSUE 10:

Q. DESCRIBE AMERITECH ILLINOIS' CONCERN OVER RHYTHMS' AND COVAD'S PROPOSAL WITH RESPECT TO THE REPAIR AND

MAINTENANCE TIME INTERVAL.

A. Rhythms and Covad propose that Ameritech Illinois maintain a mean-time-to-repair interval of two hours. Rhythms and Covad propose that Ameritech Illinois should accept maintenance trouble tickets and perform maintenance and repair on a 24/7 basis. Rhythms and Covad further propose that where Ameritech Illinois owns the splitter and provides CLECs with access to the splitter, CLECS require 24/7 access to the splitter and to the test head for maintenance, repair and testing.

Ameritech Illinois will respond to all CENTRAL OFFICE trouble as quickly as possible, often in less than 24 hours EXCLUDING WEEKENDS & HOLIDAYS. Rhythms' and Covad's proposed repair interval of two hours, however, is unacceptable. SBC proposes a repair interval of 24 hours or parity with Ameritech Illinois' data affiliate, whichever is less. Ameritech Illinois acknowledges that in many cases the interval will be less than 24 hours, depending on the nature of the problem. However, trouble found to be in the outside plant would result in a dispatch to the field. Resolution would involve dispatch time, drive time, repair time, possible coordination with the assignment center to find a good pair, etc. These activities would exceed two hours.

Additionally, not all Ameritech Illinois' offices are staffed with personnel dedicated to maintenance and repair of line sharing equipment, and Ameritech Illinois should not be required to incur costs related to an unduly burdensome response time. In some cases,

trouble will be isolated to an office that is unmanned; thus requiring a dispatch which, a stated above, will take significantly longer than 2 hours. For manned offices, trouble resolution should be less than 24 hours, but not two hours. A technician in the office may have numerous tickets and orders to work each day and be unable to drop everything to work multiple trouble tickets. Given the complexity of the wiring configuration for line sharing and the splitter, it may take some time for the technician to trace out the circuit and resolve the problem. Ameritech Illinois' offer of providing parity with its data affiliate ensures that all steps will be taken to repair the problem as quickly as possible

It is also important to note that Ameritech Illinois allows the CLECs 24 hours to clear any trouble causing significant degradation or out of service condition to the POTS service. Ameritech Illinois should be given the same amount of time. More importantly, under Ameritech Illinois' 24-hour standard all data providers, including Ameritech Illinois' data affiliate's own xDSL-based service, will be treated uniformly.

ISSUE 11:

Q. DESCRIBE AMERITECH ILLINOIS' POSITION ON RHYTHMS' AND COVAD'S PROPOSAL THAT AMERITECH ILLINOIS PAY FOR CABLING?

Ameritech Illinois disagrees with Rhythms' and Covad's argument that Ameritech

Illinois pay for the cables that return the voice traffic to Ameritech Illinois after it leaves the splitter; rather, the CLECs should pay for all cross-connects and cabling required to enable it to line share. But for line sharing, Ameritech Illinois would not even own splitters. The CLECs are clearly the "cost causers" and should pay for the cabling necessary to obtain access to the high frequency portion of the loop whether the CLEC owns the splitter or whether the ILEC owns the splitter.

Q. COVAD AND RHYTHMS ASSERT THAT AMERITECH ILLINOIS IS RESPONSIBLE FOR PROVIDING THE CABLING FROM THE SPLITTER TO THE VOICE SWITCH. CAN YOU EXPLAIN THE NETWORK ARCHITECTURE AND HOW THIS EXTRA CABLING COMES ABOUT?

A. Yes. Before line sharing, Ameritech Illinois would serve a retail POTS customer by running a jumper from the end-user cable pair on the MDF to the office equipment ("OE") for the switch port. No additional cabling is required. With line sharing, the end-user cable pair must be connected as follows:

Ameritech Owned Splitter (See Attachment 2)

(1) Cross connect from the data port of the splitter block to the CLECs designated cable.

(2) Cross connect from the voice port of the splitter block to the tie pair carrying the signal to the MDF.

(3) Cross connect from the cable pair (or line) port at the splitter block to the tie pair carrying the voice and data signal to the MDF.

(4) Cross connect from the MDF tie pair to the voice switch port on the MDF

(5) Cross connect from the MDF tie pair to the end user's cable pair.

CLEC Owned Splitter (See Attachment 1)

(1) Cross connect from the voice port of the splitter block to the tie pair carrying the signal to the MDF.

(2) Cross connect from the cable pair (or line) port at the splitter block to the tie pair carrying the voice and data signal to the MDF.

(4) Cross connect from the MDF tie pair to the voice switch port on the MDF

(5) Cross connect from the MDF tie pair to the end user's cable pair.

Q. WHO SHOULD PAY FOR THE CROSS CONNECTS REQUIRED FOR LINE SHARING?

A. CLECs should pay for all cross-connects. CLECs should pay the recurring and non-recurring prices for cross-connects specified in the HFPL Pricing Appendix. The recurring price for ~~each~~ the cross-connect Rate element is 56¢ per month and is based on the ~~time and labor necessary to do the work~~ INVESTMENT REQUIRED. Ameritech Illinois proposes non-recurring prices for line sharing to recover the cost of disconnecting the jumper that connects the POTS loop from the switch, establishing new jumpers within the MDF, and performing tests to ensure continuity.

As described above, it is clear that the CLECs line sharing is the direct cause for the cabling both to the splitter, and *back from the splitter* to the switch port. That cabling is not otherwise recovered nor contemplated in the non-recurring or recurring portion of the end-user POTS service. Thus, it is Ameritech Illinois' position that a CLEC, as the cost causer, should compensate Ameritech Illinois for those cabling costs

Q. COVAD AND RHYTHMS DESCRIBE AN ARRANGEMENT WHERE THE CLEC-OWNED SPLITTER IS PLACED IN A "COMMON" AREA AND THAT CABLING FROM THE SPLITTER TO THE COLLOCATED DSLAM IS DONE VIA CROSS-CONNECTS ON THE MDF. DOES AMERITECH ILLINOIS OBJECT TO THIS?

A. Yes. First, Ameritech Illinois is not certain what the CLECs are referring to as "common area." CLECs may place equipment in the central office under the collocation terms and conditions found in the commission-approved collocation tariff. Common area is collocation space and will be provided as such (either caged, cageless, or virtual). Cabling for the data traffic between the splitter and the DSLAM should be done with direct cabling, not via cross-connects to the IDF/MDF when the CLEC owns/provides the splitter.

VII. CONCLUSION

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. Ameritech Illinois' proposed contract language for line sharing fully implements the FCC's *Line Sharing Order*. Ameritech Illinois has offered to voluntarily own the splitters and provide them in line at a time increments. Ameritech Illinois has provided a schedule such that 27% of the requested lines will be available by June 6th; 48% by June

20th; 83% by July 27th and 100% by August 27th, 2000 if all delivery dates for the raw materials are met. Ameritech Illinois' language will enable interested CLECs to fully implement line sharing, if desired. Therefore, the Commission should adopt Ameritech Illinois' proposed language.

Q. WILL AMERITECH ILLINOIS CONTINUE TO WORK WITH THE CLECS DURING THIS PROCEEDING?

A. Yes. As I have demonstrated in this testimony, Ameritech Illinois has made many modifications to date based on CLEC input. Examples include: offering the product with a Ameritech Illinois-owned splitter option, agreeing to deploy according to a CLEC ranked schedule of offices without stipulating a cap, providing MLT test access and providing the CLECs with a shortened interval should they reuse existing cabling for line sharing.

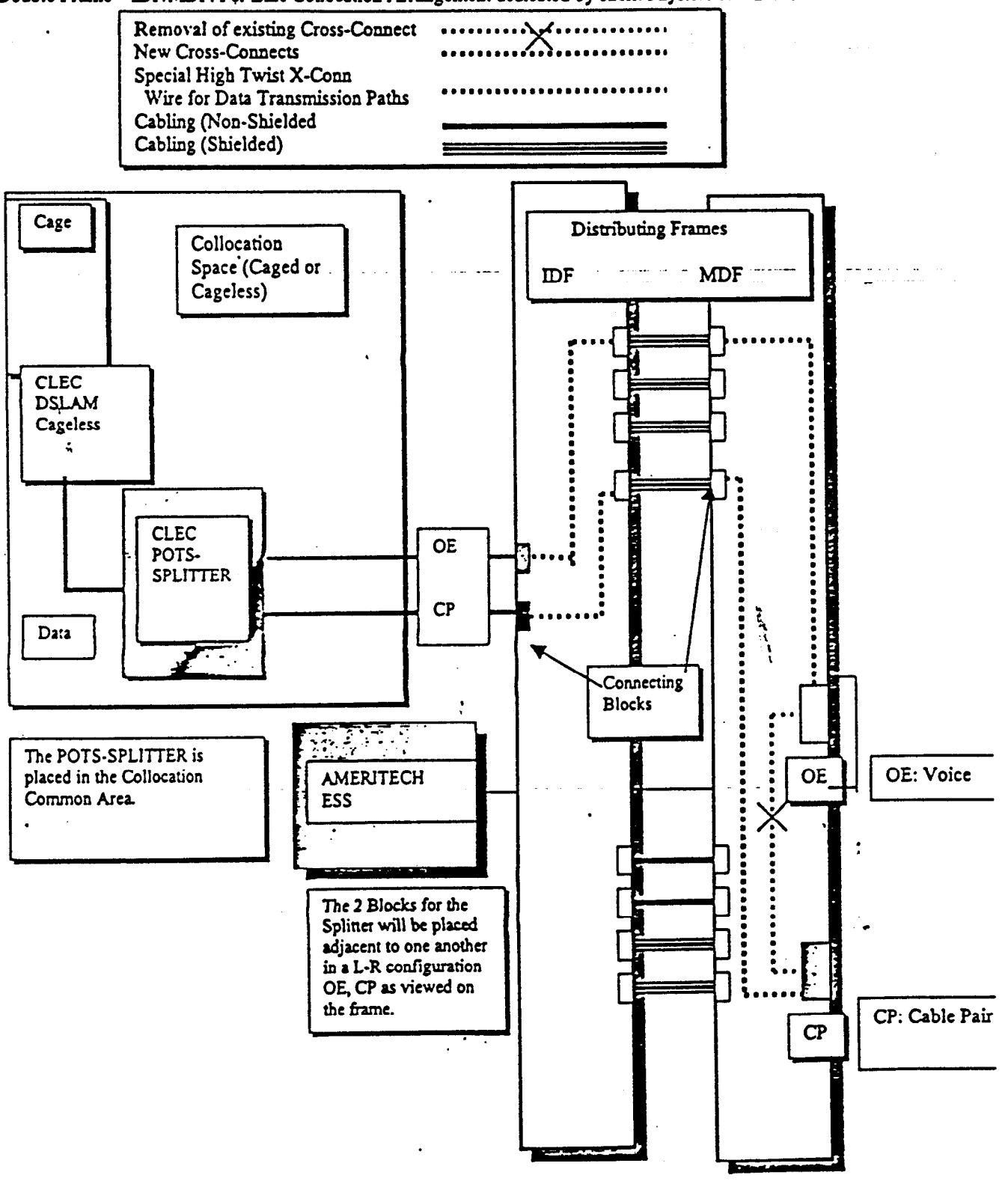
Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, at this time.

Attachment 1

POTS-SPLITTER – DLEC/CLEC Owned

Double Frame – IDF/MDF: Per Line Collocation Arrangement dedicated by shelf: Physical or Virtual



Attachment 2

POTS-SPLITTER – Ameritech Owned – Line at a Time

Double Frame – IDF/MDF: Per Line Collocation Arrangement: Physical or Virtual